1	AARON D. FORD Attorney General	
2	GREGORY L. ZUNINO, Bar No. 4805 Deputy Solicitor General	
3	State of Nevada 100 N. Carson Street	
4	Carson City, Nevada 89701-4717 Tel: (775) 684-1100	
5	E-mail: glzunino@ag.nv.gov E-mail: cnewby@ag.nv.gov Attorneys for Barbara Cegavske	
6		
7		
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10	FIGHT FOR NEVADA,	
11	Plaintiffs,	Case No. 2:20-cv-00837-RFB-EJY
12	vs.	DECLARATION OF WAYNE THORLEY
13	BARBARA CEGAVSKE, in her official capacity as Nevada Secretary of State,	
14	Defendants.	
15		
16		
17	I, WAYNE THORLEY, declare as follows:	
18	I am the Deputy of Elections for the Nevada Secretary of State. I was appointed to	
19	the position of Deputy of Elections pursuant to NRS 225.060(1), and I have held the	
20	position since October 21, 2015. I have personal knowledge of the matters set forth below,	
21	and if called upon to testify in the above-captioned matter, I would testify as follows:	
22	1. The notice of intent to recall required pursuant to NRS 306.015 was filed on	
23	February 14, 2020. A copy of the notice of intent is attached.	
24	2. Article 2, Section 9 of the Nevada Constitution requires recall petitions to	
25	include signatures from at least 25 percent of the voters who actually voted in the election	
26	at which the public officer was elected. At the 2018 general election, there were 975,980	
27	votes cast statewide. This means 243,995 valid signatures are required to trigger a recall	

election.

28

Case 2:20-cv-00837-RFB-EJY Document 10 Filed 05/12/20 Page 2 of 3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. Pursuant to NRS 306.015, Fight For Nevada has 90 days to gather signatures on the recall petition from the date the notice of intent was filed. The 90th day is May 14, 2020.

- 4. Due to changes from the 2019 legislative session, NRS 306.015 now requires recall supporters to turn in signatures collected to date at the midpoint (45 days) of the 90-day signature gathering period. The 45th day was March 30, 2020.
- 5. The total number of signatures submitted at the midpoint was 15,892. This represents 6.5 percent of the total number of signatures needed. Also, this is just the raw total. Signatures have not been verified (and will not be verified unless enough raw total signatures are submitted). After signature verification the total number of valid signatures would be somewhat less than 15,892.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 12th day of May, 2020.

<u>/s/ Wayne Thorley</u> WAYNE THORLEY

CERTIFICATE OF SERVICE I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 12th day of May, 2020, I filed with this Court's CM/ECF electronic filing system, DECLARATION OF WAYNE THORLEY, and served by this Court's electronic notification system to the addresses listed below: Robert E. Barnes, Esq. robertbarnes@barneslawllp.com Jeffrey Jaegar, Esq. jeff@jeffjaeger.com Pro Hac Vice Pending Counsel for Plaintiff An employee of the Office of the Attorney General